

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**STEPHANIE P. JONES;** )  
                                )  
**Plaintiff,**                 )  
                                )  
v.                              ) Civil Action No.: 07-695-WKW  
                                )  
**AT&T MOBILITY, LLC;**     ) **JURY DEMAND**  
**AFNI, INC.; and, PALISADES** )  
**COLLECTIONS, LLC;**         )  
                                )  
**Defendants.**                 )

**MOTION FOR DEFAULT JUDGMENT**  
**AGAINST DEFENDANT PALISADES COLLECTIONS, LLC.**

**COMES NOW** Plaintiff in the above-styled cause and moves this Honorable Court to enter a default judgment against **PALISADES COLLECTIONS, LLC.** As grounds for this motion Plaintiff states as follows:

1.     The Summons and Complaint in this matter was served upon **PALISADES COLLECTIONS, LLC** on August 13, 2007 pursuant to the Federal Rules of Civil Procedure.
2.     Counsel for this Defendant, Matt Parnell, contacted the undersigned soon thereafter acknowledging receipt of the summons and complaint by his client; and, requesting a courtesy extension of his client's time to respond to the complaint while the Parties explored settlement.

3.     Over the next several weeks settlement discussions had, in the opinion of the undersigned, resulted in an agreement to consummate a Protanto Settlement with this

defendant. However, no check has arrived; no written agreements have been signed; and telephone calls have gone unreturned.

3. Said Defendant has failed to file any response to the Complaint as of the date of filing of this motion.

**WHEREFORE PREMISES CONSIDERED**, Plaintiffs move the Court to enter a default judgment against **PALISADES COLLECTIONS, LLC.**, and in favor of Plaintiff, with leave to prove damages.

Respectfully Submitted,

/s/ Robert E. Kirby, Jr.

ROBERT E. KIRBY, JR. (KIR013)  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have filed this motion on January 31, 2008 via the Federal Court E-Filing system such that all counsel of record set out below will be served. I have also served a copy of this motion on Counsel for Palisades Matt Parnell at the address below.

Jere F. White, Jr., Esq.  
Sara Anne Ford, Esq.  
S. Andrew Kelly, Esq.  
(*Counsel for ATT&T*)

Neal D. Moore, III., Esq.  
(*Counsel for AFNI*)

Justin Matthew Parnell, Esq.

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*(Counsel for Palisades)*